REMARKS

Claims 1-20 were pending in this application. Claims 1 and 7-20 were rejected. Claims 2-6 were objected to. No claims have been amended or cancelled. Reconsideration of the rejections of all pending claims is requested.

I.   **Rejection of Claims 1 and 7-10 Under 35 U.S.C. §102(e)**

Claims 1 and 7-10 were rejected under 35 U.S.C. §102(e) as being anticipated by Conoval (U.S. 6,400,903).

CLAIM 1

Claim 1 is independent and includes the following element:

a) **training the image capture system** to respond to at least one command that is received from the foreign remote control.
(emphasis added)

The office action states that Conoval discloses the training element of claim 1 printed above at column 8, lines 37-49. This section of Conoval states the following:

Referring to FIG. 1A, an overall view of the remote relay controller in relation to an external digital camera is shown. In this configuration, communications between the remote relay controller and a local processor is accomplished by means of a modem. Digital camera 2 attaches to enclosure 1, which contains the relay controller electronics and modem, by means of mounting screw assembly 3. A detail of mounting screw assembly 3 is shown as 3a which includes a threaded mounting screw 4 on one end and a knurled knob 5 on the opposite end. Knurled knob 5 has embedded therein, a threaded

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cavity 6 for receiving a reciprocal threaded screw for attachment of an additional mounting device such as a tripod, bracket or the like.

The cited section of Conoval teaches the physical connection of a digital camera to a remote relay controller. Conoval does not teach any training as claimed in claim 1. More specifically, Conoval does not disclose "**training the image capture system** to respond to at least one command that is received from the foreign remote control" as claimed in claim 1. The applicants note that some sort of connection of a remote relay controller to a camera does not constitute training an image capture system as claimed in claim 1. Thus, Conoval does not disclose all the elements of claim 1 and cannot anticipate claim 1.

Based on the foregoing, the rejection of claim 1 has been overcome and the applicants request reconsideration of the rejection.

CLAIMS 7-10

Claims 7-10 are dependent on claim 1 and are deemed allowable by way of their dependence and for other reasons. Therefore, the applicants request reconsideration of the rejections.

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II.   **Rejection of Claims 11-15 and 17-20 Under 35 U.S.C. §102(e)**

Claims 11-15 and 17-20 were rejected under 35 U.S.C. §102(e) as being anticipated by Rodriguez (U.S. 6,889,191).

CLAIM 11

Claim 11 is independent and is retyped as follows:

An image capture system comprising:

a) a first function that is accessible by a user;

b) a proxy-based remote control mechanism for receiving commands from a foreign remote control, for associating at least one received command with the first function of the image capture system, and for storing the association between the received command and the first function in an association table during a training mode;

wherein the proxy-based remote control mechanism during operation receives commands from the foreign remote control, decodes the commands by employing the association table, and allows the foreign remote control to access the function of the image capture system corresponding to the decoded command.

The applicant notes that claim 11 refers to two devices, an image capture system and a foreign remote control. The claim is directed toward the image capture system, which can receive commands from the foreign remote control.

According to the office action, the proxy-based remote control mechanism, which is an element of the image capture system and receives commands from the foreign remote control, is the DCHT disclosed in Rodriguez. According to the background of Rodriguez, the DCHT is a digital home communication terminal. Such a device is

commonly used as an interface between a cable television line and a television and is used for channel selection and the like.

It is noted that claim 11 requires that the proxy-based remote control mechanism be able to receive commands from the foreign remote control, wherein the commands are associated with a function of the image capture system. It is inherent in the claim language that the commands received by the proxy-based remote control system serve some function related to image capture.

There is no disclosure in Rodriguez related to the DCHT being associated with a image capture system. Reference is made to column 4, line 58 to column 5, line 6 of Rodriguez. However, this section of Rodriguez discloses methods for the DCHT to recognize voice commands. There is no disclosure in this section of Rodriguez related to the commands being related to image capture. The applicant notes that a portion of Rodriguez between column 8, line 22 and column 9, line 53 mentions that a camera may be connected to the DCHT. However, the DCHT does not transmit commands associated with image capture.

Based on the foregoing, Rodriguez does not disclose "a proxy-based remote control mechanism for receiving commands from a foreign remote control, for associating at least one received command with the first function of the image capture system" as claimed in claim 11. Therefore, Rodriguez cannot anticipate claim 11 and the applicants request reconsideration of the rejection.

CLAIMS 12-15

Claims 12-15 are dependent on claim 11 and are deemed allowable by way of their dependence and for other reasons. Therefore, the applicants request reconsideration of the rejections.

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CLAIM 17

Claim 17 is independent and was rejected on the same grounds as claim 11. Claim 17 includes the element of "a proxy-based remote control mechanism for receiving commands from a foreign remote control, for associating at least one received command with the first function of the image capture system." As set forth above, this element is not disclosed in Rodriguez.

Based on the foregoing, Rodriguez does not disclose all the elements of claim 17 and therefore cannot anticipate claim 17. The applicants request reconsideration of the rejection.

CLAIMS 18 AND 19

Claims 18 and 19 are dependent on claim 17 and are deemed allowable by way of their dependence and for other reasons. Therefore, the applicants request reconsideration of the rejections.

CLAIM 20

Claim 20 is independent and was rejected on the same grounds as claims 1 and 11. Claim 20 includes the element of "a proxy-based remote control mechanism for receiving commands from a foreign remote control and for associating at least one received command with the first function of the image capture system." As set forth above, this element is not disclosed in Rodriguez.

Based on the foregoing, Rodriguez does not disclose all the elements of claim 20 and therefore cannot anticipate claim 20. The applicants request reconsideration of the rejection.

III.   **Rejection of Claim 16 Under 35 U.S.C. §103(a)**

Claim 16 was rejected under 35 U.S.C. §103(a) as being unpatentable over Rodriguez in view of Conoval.

Claim 16 is dependent on claim 11 and is deemed allowable by way of its dependence and for other reasons. Therefore, the applicants request reconsideration of the rejection.

In view of the above, all of the pending claims are now believed to be in condition for allowance and a notice to that effect is earnestly solicited.

Respectfully submitted,
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